

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MIGUEL ANGEL RIVERA GARCIA
DIANA MARTINEZ RODRIGUEZ

DEBTORS

CASE NO 12-00263 MCF

CHAPTER 13

**DEBTORS' REPLY TO TRUSTEE'S MOTION TO DISMISS
DOCKET NO. 86 and
REQUEST FOR EXTENSION OF TIME TO CURE BALANCE ON PLAN ARREARS**

TO THE HONORABLE COURT:

COME NOW, MIGUEL ANGEL RIVERA GARCIA and DIANA MARTINEZ RODRIGUEZ, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, dated July 31, 2015, docket no. 86, basically stating that the debtors were in arrears in their Plan payments in the sum of \$2,275.00.

2. The debtors hereby reply to the Trustee's motion respectfully stating that on this same date, October 5, 2015, they sent to the Trustee three (3) postal money orders each for the sum of \$455.00, for a total paid in of \$1,365.00, to partially cure the Plan arrears.

3. The debtors are still in arrears in their Plan payments and they propose to cure these arrears within twenty-one (21) days.

4. Based on the aforementioned, the debtors respectfully request an additional extension of time of twenty one (21) days within to cure the Plan arrears and inform the Court, accordingly. This extension of time to expire on October 26, 2015.

WHEREFORE debtors respectfully pray this Honorable Court grant the present reply to the Trustee's motion requesting dismissal, and grant the requested extension of time.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by

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Debtors' Reply to Trustee's Motion to Dismiss
Case no. 12-00263 MCF13

United States Postal Service copy of this motion to the following non-participant: debtors, Miguel Angel Rivera García and Diana Martinez Rodriguez, Urb Diamaris 330 Crisatemos Street Juncos PR 00777, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 5th day of October, 2015.

/s/ Roberto Figueroa Carrasquillo

USDC #203614

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